

KIRSTEN A. MILTON, ESQ.  
Nevada State Bar No. 14401  
**JACKSON LEWIS P.C.**  
300 S. Fourth St., Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [kirsten.milton@jacksonlewis.com](mailto:kirsten.milton@jacksonlewis.com)

*Attorney for Defendants  
Travel & Leisure Co.  
Wyndham Worldwide Operations Inc. and  
Wyndham Vacation Ownership*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KLALEH J. PARKER, an individual,

Plaintiff,

vs.

TRAVEL & LEISURE CO.; WYNDHAM  
WORLDWIDE OPERATIONS INC.;  
WYNDHAM VACATION OWNERSHIP;  
AND DOES 1-10 and ROE ENTITIES 1-10,  
inclusive,

Defendants.

Case No. 2:25-cv-00354-MDC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Klaleh J. Parker ("Plaintiff"), by and through her counsel, F. Travis Buchanan, Esq., & Assoc., PLLC, and Defendants, Travel & Leisure Co., Wyndham Worldwide Operations Inc. and Wyndham Vacation Ownership ("Defendants"), by and through their counsel, the law firm of Jackson Lewis P.C., that Defendants shall have a 30-day extension up to and including **July 3, 2025**, in which to file their response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Defendants were served with the Summons and Complaint on May 13, 2025, (ECF No. 1) making Defendants' response to Plaintiff's Complaint currently due on June 3, 2025.

2. Defendants were recently retained and are still in the process of investigating Plaintiff's allegations which include significant monetary damages, including, punitive damages.

3. The Parties have agreed to extend the deadline for Defendants to file their response

1 to Plaintiff's Complaint to July 3, 2025, to allow Defendants sufficient time to address the  
2 allegations within the Complaint.

3 4. This is the first stipulation to extend the time for Defendants to respond to  
4 Plaintiff's Complaint.

5 5. The Parties believe these circumstances constitute good cause for granting an  
6 extension. *See* Fed. R. Civ. P. 6(b)(1).

7 6. This Stipulation is made in good faith and not for the purpose of delay.

8 7. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair  
9 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation  
10 and Order shall be construed as an admission of or consent to the merit or validity of any claim,  
11 defense, objection, or right by any party in this case.

12 Dated this 3rd day of June, 2025.

13 F. TRAVIS BUCHANAN, ESQ., &  
14 ASSOC., PLLC

JACKSON LEWIS P.C.

15 /s/ F. Travis Buchanan  
16 F. Travis Buchanan, Bar # 2398  
701 E. Bridger Ave., Suite 540  
Las Vegas, NV 89101

15 /s/ Kirsten A. Milton  
Kirsten A. Milton, Bar # 14401  
300 S. Fourth St., Suite 900  
Las Vegas, Nevada 89101

17 Alvin L. Pittman, *Admitted Pro Hac Vice*  
18 California Bar No. 127001  
5777 W. Century Blvd., Suite 1685  
19 Los Angeles, CA 90045-5678

*Attorney for Defendants*  
*Travel & Leisure Co.*  
*Wyndham Worldwide Operations Inc. and*  
*Wyndham Vacation Ownership*

20 *Attorneys for Plaintiff*  
21 *Klaleh J. Parker*

22 **ORDER**

23 IT IS SO ORDERED

24  
25 United States District/Magistrate Judge

26 Date: 6-20-25  
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